

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
AT CINCINNATI**

TEDDY NICHOLS,	)	Case No. C-1-02-0045
	)	
Plaintiff,	)	Judge Beckwith
	)	
v.	)	
	)	
INDIANA MICHIGAN POWER CO.	)	
RIVER TRANSPORTATION DIVISION	)	
and/or AMERICAN ELECTRIC FUEL	)	
SUPPLY, RIVER TRANSPORTATION	)	
DIVISION,	)	
	)	
Defendant.	)	

**NOTICE TO TAKE VIDEOTAPE DEPOSITION OF  
DR. ARTHUR LEE**

**TO:**

Gary Wm. Baun, Esq.  
401 S. Old Woodward, Suite 320  
Birmingham, MI 48009  
**Attorney for Plaintiff**

**WITNESS TO BE DEPOSED:**

Dr. Arthur Lee

**DATE AND TIME:**

Thursday, March 25, 2004  
at 4:00 p.m.

**PLACE DEPOSITION IS TO  
BE TAKEN:** At the offices of:

Dr. Arthur Lee  
Wellington Orthopaedic & Sports Medicine  
7663 Five Mile Road  
Cincinnati, Ohio 45230  
(513) 232-6677

**PLEASE TAKE NOTICE** that at the above-stated date, hour and place, we shall take the stenographic and videotaped deposition of the witness above-stated, pursuant to the Federal Rules of Civil Procedure, for all purposes permitted pursuant to law, before a notary public, at which time the witness hereby being notified shall appear and at which time any party or their attorney may

appear and examine, if they may see fit.

This deposition is subject to continuance from time to time and place to place until completed.

Respectfully submitted,

s/Todd M. Powers  
Todd M. Powers, Esq. (0027122)  
SCHROEDER, MAUNDRELL, BARBIERE & POWERS  
11935 Mason Road, Suite 110  
Cincinnati, OH 45249-3703  
(513) 583-4212 (telephone)  
(513) 583-4203 (facsimile)  
**Attorney for Defendants**

**CERTIFICATE OF SERVICE**

\_\_\_\_ I hereby certify that a true and accurate copy of the foregoing was served upon the following this 28th day of January, 2004:

Gary Wm. Baun, Esq.  
401 S. Old Woodward, Suite 320  
Birmingham, MI 48009  
**Attorneys for Plaintiff**

s/Todd M. Powers  
Todd M. Powers